

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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| <p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p>as representative of</p> <p>THE COMMONWEALTH OF PUERTO RICO, et al.,</p> <p>Debtors.</p> | <p>PROMESA Title III</p> <p>Case No. 17-BK-3283-LTS (Jointly Administered)</p> |
| <p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p>as representative of</p> <p>PUERTO RICO ELECTRIC POWER AUTHORITY,</p> <p>Debtor.</p> | <p>Case No. 17-BK-4780-LTS</p> <p>This Court Filing Relates Only to PREPA and Shall Only Be Filed in PREPA's Title III Case (Case No. 17-BK-4780-LTS)</p> |
| <p>SCIEMUS LIMITED, ET AL.,</p> <p>Plaintiffs/Counter-Defendants,</p> <p>v.</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p>as representative of</p> <p>PUERTO RICO ELECTRIC POWER AUTHORITY,</p> <p>Defendants/Counterclaim-Plaintiff.</p> | <p>Adv. Pro. No. 3:19-AP-369-LTS</p> <p>DECLARATORY JUDGMENT ACTION</p> |
| <p>SCIEMUS LIMITED, ET AL.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>PREPA NETWORKS, LLC, PREPA NET INTERNATIONAL WHOLESALE TRANSPORT, INC., COMMONWEALTH OF PUERTO RICO, and</p> | |

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SECRETARY OF THE TREASURY, c/o Public
Insurance Bureau,

Defendants.

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO ELECTRIC POWER AUTHORITY,

Third Party Plaintiff,

v.

ASPEN INSURANCE, as representative for Lloyd's
Syndicates 2623, 623, 3902, 1084, 2010 and 1301; and
LLYOD'S SYNDICATES CNP 4444 and AMA
SYNDICATE

Third Party Defendants.

**DECLARATION ON BEHALF OF AND AS CORPORATE REPRESENTATIVE OF
PREPA NETWORKS LLC**

I, José A. Casillas Aponte, declare as follows pursuant to 28 U.S.C. § 1746:

1. My name is José A. Casillas Aponte. I am over the age of 21 years, and I am fully competent to make this Declaration. I am the Managing Director of PREPA Networks LLC ("PREPA Networks").

2. I am giving this Declaration on personal knowledge and as a corporate representative of PREPA Networks, with full authority to make this declaration on behalf of PREPA Networks.

3. I, on behalf of PREPA Networks, have reviewed the Second Amended Complaint filed in this action ("Complaint"). I have also reviewed the records that are the subject of this Declaration and/or have spoken to all current employees of PREPA Networks with knowledge of

the records. This Declaration is made based upon information known or reasonably available to PREPA Networks.

4. Based on information provided to me, I understand that on June 3, 2019, Insurers Sciemus Limited; Markel Europe; Lloyd's Syndicates MSP 318, WRB 1967, and AGM 2488 subscribing to Policy No. B0804Q11263F14; Lloyd's Syndicates MIT 3210, KLN 510, MMX 2010, CSL 1084, TMK 1880, AML 2001, and BRT 2987 subscribing to Policy No. B080414390F14; Indian Harbor Insurance Company; PartnerRe Ireland Insurance dac; and Swiss National Insurance Co. Ltd. via local placement with Multinational Insurance Company (collectively, "2014-15 Insurers") brought an action for Declaratory Judgment against Puerto Rico Electric Power Authority ("PREPA") arising from damage to a reserve fuel oil storage tank at the PREPA South Coast (Costa Sur) thermoelectric power plant in Guayanilla, Puerto Rico ("PREPA's Claim").¹ The 2014-15 Insurers subscribed to a commercial property insurance policy issued to PREPA for the policy period May 15, 2014 – May 2015 (the "2014-15 Policy"). PREPA Networks and PREPA Net International Wholesale Transport Inc. are listed as additional insureds under the 2014-15 Policy.

5. The 2014-15 Insurers subsequently served PREPA Networks, in connection with this action, and served PREPA Net International Wholesale Transport Inc.

6. I also understand that on April 30, 2020, PREPA filed an Answer and Counterclaim to the 2014-15 Insurers' Complaint, in which PREPA brought counterclaims against the 2014-15 Insurers, and also brought additional claims under a separate commercial property insurance property policy issued to PREPA for the policy period May 15, 2015 – May 15, 2016 (the "2015-

¹ Ironshore Insurance Ltd. is also an insurer on the 2014-15 Policy; however, it is not a party to the referenced litigation.

16 Policy”), to which the following insurers subscribe: Lloyd’s Syndicates MIT 3210, KLN 0510, MMX 2010, CSL 1084, TMK 1880, AML 2001, BRT 2987, HDU 0382, CNP 4444/CNP958, MSP 0318, WRB 1967, AMA 1200, and AGM 2488; Markel Bermuda Limited; Indian Harbor Insurance Company; Swiss National Insurance Company and Aspen Syndicate 4711 via local placement with Multinational Insurance Company; and PartnerRe Ireland Insurance dac (collectively the “2015-16 Insurers”² and together with the 2014-15 Insurers, the “Insurers”).³

7. PREPA Networks and PREPA Net International Wholesale Transport Inc. are listed as additional insureds under the 2015-16 Policy.

8. PREPA Net International Wholesale Transport Inc. was merged out of existence when it was merged with PREPA Networks in 2012.

9. PREPA Networks has no claims under the 2014-15 Policy or the 2015-16 Policy, and as such, PREPA Net International Wholesale Transport Inc. likewise has no claims under the 2014-15 Policy or the 2015-16 Policy.

10. PREPA Networks claims no right to payment of the policy proceeds for PREPA’s Claim.


11. PREPA Networks does not seek coverage from the Insurers for damages to the reserve fuel oil storage tank at the PREPA South Coast (Costa Sur) thermoelectric power plant.

² Some of the 2014-15 Insurers are also 2015-16 Insurers.

³ Ironshore Insurance Ltd. is also an insurer on the 2015-16 Policy and should be included in the defined term “Insurers”; however, it is not a party to the referenced litigation. Insurers on the 2015-16 Policy have been identified to the best of the parties’ ability. Regardless of the identity of the Insurers on the two Policies or if an Insurer identified in paragraphs 4 or 6 above is in error, PREPA Networks nor PREPA Net International Wholesale Transport Inc. have any claims under either the 2014-15 Policy or the 2015-16 Policy.

Pursuant to 28 U.S.C. § 1746, I further declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Executed on this 21st day of September, 2020.



José D. Casillas Aponte, on behalf of and as
corporate representative of PREPA Networks LLC.